
MEDINA LAW FIRM LLC

641 LEXINGTON AVENUE
Thirteenth Floor
New York, NY 10022
Telephone: (212)-404-1742
Facsimile: (888)-833-9534

A Limited Liability Company
www.medinafirm.com

1199 S. FEDERAL HIGHWAY
Suite 421
Boca Raton, FL 33432
Telephone: (954)-546-0980
Facsimile: (888)-833-9534

Eric S. Medina, Esq.^o

Writer's Email:
emedina@medinafirm.com

^oMember NY, NJ & FL Bars

December 20, 2021

VIA CM/ECF & EMAIL (CRONANNYSDCAMBERS@NYS.USCOURTS.GOV)

Hon. John P. Cronan, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Honeedew Investing LLC vs. Jose Abadi*
Case No. 1:19-cv-08951(JPC)
Letter Motion Extension of Time to Move for Entry of Default Judgment

Dear Judge Cronan:

As Your Honor is aware, the undersigned represents Plaintiff Honeedew Investing, LLC ("Honeedew" or "Plaintiff") in the above-referenced matter. I write to respectfully request a brief extension of three (3) days-time to file Plaintiff's motion for the entry of default judgment (the "Motion") against defendant Jose Abadi ("Defendant") from December 20, 2021, as set forth in Your Honor's Order dated December 9, 2021 [Dkt. 16] through and until December 23, 2021.

Pursuant to Your Honor's individual rules of practice this request is occasioned by the previously unforeseen need to annex certain additional evidentiary materials in support of the Motion which require translation services from Spanish to English and which will not be ready by today's date. Plaintiff further requires additional time in order to ensure that the Motion is served contemporaneously with its filing pursuant to Your Honor's individual rules of practice. There has been no prior request for extension in connection with Plaintiff's Motion. The Defendant was served with process on or about October 27, 2021, in Buenos Aires, Argentina. To date, neither the Plaintiff nor counsel have been contacted by the Defendant or any person on his behalf regarding this matter. Plaintiff's efforts to serve the Defendant with process in this matter were delayed due to pandemic-related disruptions/delays in the country of Argentina.

Plaintiff submits that the minor enlargement of time sought hereby will not impact the schedule set forth in the Court's December 9, 2021, Order, which contemplates opposition be filed by

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Defendant by January 12, 2022 and which schedules a related 'Show Cause' hearing on January 31, 2022. Plaintiff was unable to make this request to the Court sooner in light of the unanticipated need to annex certain proofs relating to the real estate transferred in the country of Uruguay and the need for translation services therefore.

Thank you in advance for Your Honor's consideration.

Respectfully submitted,

/s/ Eric S. Medina

Eric S. Medina, Esq.

cc: Matthew J. Aaronson, Esq.

The Court grants Plaintiff's extension request *nunc pro tunc*.

SO ORDERED.

Date: December 29, 2021

New York, New York



JOHN P. CRONAN

United States District Judge